

Workplan  
*Recycle Conejos and Costilla Counties*

**I. Project Title and Project Purpose Statement: Recycle Conejos and Costilla Counties**

Conejos County Clean Water, Inc. (CCCW), a citizens' non-profit 501(c)(3) organization based in Antonito, Colorado, is submitting this project proposal in response to the Request for Application (RFA) for the Environmental Justice Collaborative Problem-Solving Cooperative (EJCPS) Agreement Program. The project title is Recycle Conejos and Costilla Counties.

Our goal is to enhance cooperation and efficiency regarding the collection and disposal stream among current landfill operations and integrate, through the development of transfer stations, the illegal dumping waste stream into recycling operations. This project will facilitate proper collection and recycling.

CCCW and partners will reduce illegal dumping through a recycling program development in the six county area of the San Luis Valley (SLV), beginning with targeting six small communities through collaboration and identifying resource gaps within Conejos and Costilla Counties. By developing management cooperation with the regional landfill at the Rio Grande County solid waste facility, assessment of current transfer station operations can be made more efficient by reducing the current concentrated dumping burden through recycling. By integrating planning and designing of recycling at new transfer stations in Conejos and Costilla Counties to reduce the burden of current transfer stations, support would be galvanized for residents of the six communities initially and then to county residents generally, to receive technical resources about "impacts of illegal dumping" by providing planning opportunities for closer and better solid waste stream options. The public will be involved with developing long-term strategies (cost benefit analysis) to provide solutions.

This proposal will work to reverse the current social norming-which is, the tendency to choose short-term personal economics over community and environmental health furthering long-term economic cost.

Illegal dumping is wide spread throughout the SLV, but specifically in the areas of Conejos and Costilla Counties, where Hispanic and low-income communities were forced to shut down their solid waste facilities under Subtitle D of the Resource, Conservation and Recovery Act (RCRA) back in the late 1980s and early 1990s. Federal laws regulated by the U.S. Environmental Protection Agency (USEPA) were also changed requiring counties or landfill owners to provide post-closure care and monitoring of the site and liability insurance against long-term remediation costs.

The cost of operating a landfill is out of reach for most low-income communities. There are now requirements for lining the dump, maintaining a cover and guaranteeing no seepage into groundwater with the installation of monitoring wells. The regional landfill for the entire SLV is located in Rio Grande County. That is a 75-mile one-way trip from the town of San Luis, the oldest incorporated town in Colorado.

Illegal dumping is a threat to human and environmental health, groundwater and surface water resources. Our project goal is to enhance cooperation and efficiency regarding the collection and disposal stream among the current landfill operations and integrate, through the development of additional transfer stations, the illegal dumping waste stream into current landfill operations. This project will facilitate proper collection and disposal. We will be evaluating current landfill conditions and threats to water resources. This project proposes activities that are authorized by the Clean Water Act, Section 104(b)(3), specifically researching, relating to health and welfare effects of control of water pollution; Safe Drinking Water Act, Section 1442(c)(3) develop and expand the capability to carry out a program, and Solid Waste Disposal Act, Section

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8001(a); conduct and promote the coordination of research, investigations, experiments, demonstration projects, and studies relating to solid waste.

For example, illegal dumping occurs near the Culebra ditch in San Luis, which is in Costilla County. Culebra is a historic waterway, so protection of source water, ground water, and drinking water sources are an integral part of the cultural landscape.

The San Luis Valley Ecosystem Council (SLVEC) performed an Environmental Health Risk Assessment through the USEPA CARE (Community Action for a Renewed Environment) program between 2010-2012 the problem of illegal dumping as a risk to human health and the environment was found. Thirteen communities participated and over 400 households were prioritized SLV wide.

CCCW has requested assistance from Rural Community Assistance Corporation (RCAC) and the SLVEC to partner and support the six municipalities to address the illegal dumping problem through recycling. These municipalities can be viewed in a map see Appendix I.

We will investigate the amount, type, location, and sources of illegal dumping activity in the SLV, specifically, the towns of Antonito, La Jara, Manassa, Romeo, Blanca and San Luis within Conejos and Costilla Counties. Through this effort we will identify what percentage is recycling. This will be Phase I of a multiphase regional recycling project.

CCCW and partners will continue to work closely with these communities within Conejos and Costilla Counties. The partners in the Memorandums of Agreement (MOAs) are Antonito Middle School, Adams State University (ASU), Bureau of Land Management (BLM), Conejos County Land Use, Costilla County Land Use, RCAC, Recycle Creede, Sangre de Cristo National Heritage Area, SLVEC, Sociedad Protección Mutua de Trabajadores Unidos (SPMDTU), and Town of Antonito.

## **II. Environmental and/or Public Health Information about the Affected Community**

Conejos County and Costilla County are Environmental Justice (EJ) communities. The impacted environment described in this project is geographically located in Conejos County and Costilla County, where cumulative exposure to illegal dumping is a public health risk.

The 46,027 residents of the SLV are dispersed in a 122-mile long and 74-mile wide region. Located in south central Colorado, six rural counties (Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache) lie within this largely isolated geographical area. There are 18 incorporated towns, many of which are located along the Rio Grande or its tributaries. This largely agrarian and ranching community has a relatively stable population. Many of the residents are eighth generation. Some of the oldest residents are descendants of New Mexican pastoralists, the Hispanics, who settled the SLV in the early 1800s. Hispanic settlers from the south were enticed to raise crops and sheep through land grants under Mexican communal law, a practice that was adopted under Spanish reign and continued when Mexico won its independence from Spain, to settle the region Conejos County presently encompasses. When the Mexican-American War ended in 1848 and the territory was ceded to the United States with the signing of the Treaty of Guadalupe Hidalgo, the Conejos Land Grant (which includes present day Conejos County, Rio Grande County and portions of Alamosa and Saguache Counties) was the only land grant in Colorado that was petitioned for a patent and denied in its entirety.

As a result, the village enclaves and incorporated municipalities in present-day Conejos County and Costilla County were among the first established communities in Colorado. As a consequence of long residency in the region, 60% of Conejos County's population is Hispanic. Pride in the Hispanic heritage is evident in everything from the names of the rivers, mountains, and towns, to the oldest church in Colorado, Nuestra Señora de Guadalupe (Our Lady of

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Guadalupe), to the first Hispanic fraternal organization in the United States, SPMDTU. The median household income is less than the state at \$33,627 in Conejos County, and \$24,388 in Costilla County (U.S. Census 2010). Conejos County and Costilla County are among the poorest counties in the country, and unemployment levels run above the state and national averages (Conejos County's is 10.2% as of 2010; Costilla County's is 11.3% – not including the chronically unemployed) (US Bureau of Labor Statistics).

The towns that this project is focusing on for Phase I have families that are listed below the poverty level as follows: Antonito – 34.6%, La Jara – 22.8%, Manassa – 23.2%, Romeo – 30.5%, Blanca – 40.0%, San Luis – 22.8%. These are municipalities that were incorporated, in one case, more than 150 years ago (San Luis – April 9, 1851). CCCW and partners believe that managing the solid waste stream to enhance proper collection and disposal, including recycling, will bring economic benefit to these areas because resources will be managed in a more cost effective manner.

Illegal dumping in and around the Phase I communities of the SLV is a threat to human and environmental health, groundwater and surface water resources. The Health Risk Assessment that the SLVEC, a project partner, conducted through the USEPA's Community Action for a Renewed Environment (CARE) level 1 yielded illegal dumping as a primary concern of SLV residents, especially the Phase I communities. Unfortunately, the USEPA CARE grant program was defunded prior to SLVEC being able to mitigate any concerns that were prioritized during CARE level 1.

This vast area comprises a cluster of illegal dumping activities spanning an 8,100 square mile area within six counties; Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache. The SLV has limited budgets for solid waste disposal, and outreach. Past poor solid waste practices pose a significant threat to the water sources and public health. The presence of illegal dumps and the lack of regulation and enforcement in rural communities cause water and air pollution; increase greenhouse gases that affect the Earth's climate; contaminate groundwater and soil; attract disease carrying rodents and insects; and create a health hazard and danger to public safety when dumpsites are located near areas used by humans.

Disposing of waste on the landscape is a long-standing tradition in the SLV. Residents of the SLV region have been resistant to pay for solid waste disposal services, and do not have access to recycling services. The county landfills were closed by the state because of Subtitle D of RCRA implementation, and now the nearest landfill is at least a one-way 45-mile drive away. Residents from the six communities and all of Conejos and Costilla County combined must now travel to the Rio Grande County Landfill, the nearest solid waste disposal site. This situation has created a 90-mile round trip for residents, a further disincentive for proper waste disposal. There are semi-functioning transfer stations in Conejos and Costilla Counties that charge a fee for drop-off, but some were recently fenced off to prevent deposits of large unwieldy items such as refrigerators, washers, electronics, and tires. The communities have fee based waste collection available in town but no recycling services. Residents continue to dump near historic acequias (ditches), rivers, and cemeteries. The Conejos and Costilla County Land Use departments estimate 200 to 300 tons of waste materials reside in an approximately 15-mile diameter area around each community within these counties. This has raised concerns about groundwater contamination affecting residents' wells, and environmental and health hazards.

CCCW's proposed project will support the six communities in the SLV, to identify and evaluate recycling as part of the solution to their illegal dumping problems. This project has an additional benefit of being the multi-phase regional beginning for other small communities in

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Conejos and Costilla and the rest of the SLV to benefit from this project and contribute to the reduction, coordination, and enhancement of long-term regional recycling.

Inform Inc., an independent research organization that examines the effects of business practices on the environment and on human health, conducted a survey of solid waste staff and produced a report on why waste prevention programs are not more widespread in the U.S. The report stated that responsibility for solid waste management typically falls to local or regional solid waste agencies, “which have limited financial and personnel resources” to achieve a wide range of waste prevention benefits.

According to the USEPA the average person creates four pounds of solid waste daily and recycles 1.5 pounds of it; nationwide, 32% of solid waste is recycled. In order to create a contrast for communities served by this grant, research will be conducted and these numbers reported for Colorado in tons of Municipal Solid Waste (MSW) generated in Conejos County and Costilla County. We surmise by reviewing surrounding community statistics in New Mexico that less than 4% is recycled. To understand this figure better, we will research the average resident of Conejos and Costilla Counties to determine what is generated in pounds of solid waste per day compared to solid waste recycled in pounds. Construction debris also needs to be integrated as it amounts to 10,672 tons that have been accumulated throughout the SLV. The research and reporting will extend to this waste stream to present it as a percentage of the waste stream ending up in illegal dumps.

The SLV is home to the headwaters of the Rio Grande, and the residents have a moral and ethical obligation to protect the quantity and quality of the water delivered to downstream users. Illegal dumping has numerous negative impacts on the environment and human health. Contaminants and toxins are released into the environment, leached into the soil and groundwater, and swept into surface waters.

These pollutants end up in drinking water wells and water used to irrigate food crops. Decomposing trash and organic wastes can run into streams or lakes, potentially damaging aquatic life. Insects and animals attracted to the dumps can be vectors of disease. Children may become trapped or injured while playing on or near dumps. Dump fires release toxins to the air and can spread to surrounding habitat or structures.

Burning denudes the landscape and increases erosion and soil runoff to surface and groundwater. The reverse can also occur: wildfire can spread to illegal dumps, making cleanup all but impossible. In addition, the presence of dumps is self-perpetuating: once a dumpsite appears, it attracts more and more solid waste.

The SLV is physically isolated from any metropolitan-based recycling hub. The long transport distance makes recycling services expensive. Introduction of recycling services will need to be well planned and coordinated for an initial participation from the maximum amount of people to avoid large operating expense losses up until they become sustainable.

These communities’ low population density, low levels of funding, and remote location have impeded developing an effective deterrent to illegal dumping. The six communities in the SLV lack the technical expertise and resources to plan illegal dumping management efforts and implement the resulting plans. Without external assistance and facilitation, community members may not effectively address illegal dumping before it creates significant and long-lasting problems. Conejos County and Costilla County are interested in working with these communities to address illegal dumping and have asked CCCW for assistance.

Cleaning up and preventing illegal dumping through recycling pose significant challenges to the small communities of the SLV; continuing to do nothing fosters ongoing negative impacts

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on health, water quality, air quality, and quality of life. Improved solid waste management practices are crucial to protect the health and environment in these small communities.

Conejos and Costilla counties will be recruiting local community volunteers from the six communities, the BLM and the United States Department of Agriculture (USDA) Forest Service for assistance. In order to establish recycling, the communities will need assistance to quantify the problem of illegal dumps; seek funding for cleanup; inform community members, county and local government, and nearby waste management facilities to prevent further dumping; and get them all working together on long-term, sustainable plans to prevent dumping. CCCW has organized volunteers in Conejos County for four (4) years. Pertinent volunteer organizing around public lands included a yearly effort to help clean up cemeteries and illegal dumps in Conejos County in partnership with the BLM.

The communities we propose to serve have populations below or near 1,000 with sizeable Hispanic and low-income populations. See Table 1 below.

**Table 1**

Community	Population	Median Household Income (MHI)	Conejos County MHI	Costilla County MHI	State of Colorado MHI*	Community MHI as % of Colorado MHI*	% Hispanic	% Families Below Poverty Level
Antonito	734	\$21,750	\$33,627	\$24,388	\$48,673	Less than 80	80.8	34.6
La Jara	930	\$33,036				Less than 80	69.2	22.8
Manassa	1,070	\$33,917				Less than 80	50.9	23.3
Romeo	506	\$23,295				Less than 80	86.2	30.5
Blanca	336	\$20,000				Less than 80	64.9	40.0
San Luis	741	\$17,350				Less than 80	74.5	22.8

Source: U.S. Census Bureau, 2006-2010 American Community Survey

\*Not in metropolitan statistical area

The six communities were selected because they are incorporated municipalities within Conejos and Costilla Counties. This will allow for an organized political body to coordinate project work within the proposed area. These communities are led by volunteer elected Board of Trustees, and do not have the capacity to lead this initiation without the assistance of CCCW and partners.

CCCW strives to avoid the health and environmental disaster that could be created in Conejos County and Costilla County if illegal dumping continues without initiating recycling.

### **III. Organization's Historical Connection to the Affected Community**

CCCW incorporated in order to promote awareness around health and environmental issues that affect residents in Conejos County, as a vehicle for protecting public health, and to responsibly manage natural resources in 2010. CCCW is comprised of ranchers, teachers, small business owners, and concerned citizens. CCCW has 11 board members, who also serve as the organization's steering committee, and 402 general members. Chronologically, CCCW's historical connection to the affected community can be viewed in awareness efforts.

Beginning in 2010, CCCW incorporated under the state laws in Colorado into a non-profit organization organized primarily for building awareness in Conejos County surrounding health and environmental issues in Conejos County. CCCW's efforts in July 2010, focused primarily on the radioactive, hazardous, and toxic waste campaign proposed at the transfer site south of the Town of Antonito. Efforts include requesting 501(c)(3) exempt status from the IRS, hosting a website [www.cccwater.org](http://www.cccwater.org), generating a brochure, and conducting a letter campaign. CCCW participated in discussions led by then Congressman John Salazar, which consisted of

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key stakeholders in the waste dispute. Community forums were sponsored by CCCW including discussions led by Concerned Citizens for Nuclear Safety, Honor Our Pueblo Existence, and Think Outside the Bomb with residents of Conejos County. CCCW initiated a land canvass to educate and build awareness via door-to-door discussions, community centers, and information tables set up outside local grocery stores; concurrently, built membership within CCCW to 402 general members. CCCW organized and submitted a first round of public comments for the Environmental Assessment for the Low Altitude Tactical Navigations (LATN). CCCW also successfully petitioned the federal Surface Transportation Board (STB) from Washington D.C. to hold a hearing in Conejos County.

In 2011, CCCW attended the eight-hour long STB hearing held in Conejos, Colorado, and argued for local control of the proposed transfer site as well as the applicability of the Clean Railroads Act of 2008 to the operation, four people spoke in favor of the proposal and 35 people spoke in opposition. CCCW then expanded focus to other Federal agency actions ongoing in Conejos County including, the Supplement to the Draft Programmatic Environmental Impact Statement (DPEIS) for Solar Energy Development in Six Southwestern States. CCCW helped organize and submit a round of public comments for the DPEIS. Subsequently, CCCW began attending discussions on renewable energy throughout the state of Colorado to familiarize the group with a new technical area. The settlement between the DOE and CCCW, CCNS, and SLVEC was reached to ensure protection from radioactive, hazardous, and toxic waste from the cleanup funded under the American Recovery and Reinvestment Act (ARRA). CCCW then updated the STB on the settlement reached with the DOE for ARRA funded waste cleanup. Additionally, CCCW continued to research state policy to find a mechanism for community generated solar energy as a tool to build awareness around managing the solar resource in the Conejos County community. CCCW also partnered with SLVEC to help administer a Colorado Department of Public Health and Environment (CDPHE) radon home kit grant in Conejos County, and participated in the CARE grant discussions and helped with CARE community forums in Conejos County. Concurrently, CCCW partnered with CCNS to organize and submit public comment for the DEIS for Low-Level Radioactive Waste and GTCC Like Waste, and DEIS for Nuclear Facility CMRR. Then the STB announced the dismissal of the railroad's petition to declare local land-use laws pre-empted. CCCW partnered with the Town of Antonito to be the case study in the Colorado Renewable Energy Society (CRES) workshop in Monte Vista, Colorado. CCCW sponsored 15 community members to attend the CRES workshop held in November 2011. Additionally, CCCW started preparing for renewable energy planning in Conejos County and planned a community forum for the public comment for the Supplement to the DPEIS for Solar Energy Development in Six Southwestern States. CCCW organized and submitted a second round of comments for the Environmental Assessment for the LATN.

During 2012 and 2013, CCCW participated in Renewable Energy Planning, proposed the Community Solar Garden idea to the Town of Antonito and partnered with Community Energy for project development, participated in Brownsfield planning, and executed project Health Environment Launch Project (HELP) utilizing funds from the USEPA EJ Small Grant Program, presented across the State of Colorado on EJ issues, and facilitated transmission discussions impacting Conejos County.

The community forums CCCW sponsors are used as a tool for it to collaborate with the community to define issues, undertake decision-making, and ensure that all interested community members can participate equally in efforts initiated by CCCW. CCCW continues to utilize a consensus-building model. The affected community is constantly invited to participate

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at all stages of CCCW projects by published articles in local and regional newspapers, and through advertisements for all public stakeholder discussions, forums, and public meetings at the local and federal levels via the CCCW website, social networking sites Facebook, Twitter, and paper posters posted throughout Conejos County. CCCW tracks attendance at public forums, documents information requests, conducts follow-up telephone calls, and helps community members understand CCCW initiatives. CCCW provides relevant handouts, publicizes meetings, documents activities, takes minutes, and keeps comprehensive records.

#### **IV. Project Description**

Our goal is to achieve enhanced cooperation and efficiency of the collection of solid waste and integrate a portion of the illegal dumping waste stream into recycling operations. This project will facilitate proper collection and recycling. The community improvements will be a decrease in illegal dumping, and a decrease in the associated negative health and environmental risks to the disparately impacted EJ communities in the incorporated municipalities of Antonito, La Jara, Manassa, Romeo, Blanca, and San Luis. All communities will benefit once CCCW and project partners to reach the project goal implement the objectives outlined below.

Objective 1: Quantify the problem, develop data and raise awareness. CCCW and partners will facilitate a process for the communities to identify alternatives for solid waste disposal and diversion through recycling. Using proven assessment methodology, we will work with public officials, interested community members, students and land use/public health staff to document the number and locations of illegal dumpsites; inventory their contents; and estimate the cost to cleanup the sites. An effort will be made to identify the sources of dumping and the distance travelled as indicators of behavior and how far people are willing to travel to dispose of waste, and/or recycle waste.

As part of the assessment process, RCAC will assist with cost estimates of strategies to prevent future dumping and compare to the costs of repeated cleanups and compare to the costs of long-term solutions such as prevention and enforcement to deter illegal dumping, including recycling. CCCW and SLVEC will guide the hired project coordinator to develop an Outreach Program Action Plan that contains three components so it can play an integral role in this program development. The Outreach Program Action Plan will increase awareness of local government, citizens, politicians, organizations, and businesses to the hazards that illegal dumping presents to water resources, human, and environmental health. CCCW and partners will encourage the use of added transfer stations and introduce recycling materials to partially recoup operation costs.

Objective 2: Development of an Outreach Program Action Plan, raise public awareness, and develop outreach material. Using Citizen Participation by Objectives framework, curriculum developed by the Institute for Participatory Management and Planning, the hired project coordinator will be expected to participate to disseminate information to partners and the public. CCCW and partners will target specific messages to a particular audience. Contents of the outreach material developed will include the benefits of illegal dumping prevention, directing citizens to places of proper disposal (informing them about transfer stations and location planning), and recycling and enforcement awareness to deter illegal dumping.

We will raise awareness among and present findings of investigations, cost estimates and encourage financial commitment from: SLV joint county commissioners, land use and county administrators, landfill managers, municipal leaders, USEPA, CDPHE, BLM and USDA Forest Service personnel who deal with illegal dumping and industry specializing in solid waste and recycling businesses.

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We anticipate that this Outreach Program Action Plan will be used to create outreach for three different constituencies: 1) Code enforcement, elected officials, county personnel/law enforcement, BLM and USDA Forest Service personnel; 2) local water protection/non-profit potential partners, local churches, schools and residents, including illegal dumpers; 3) industry/business partners.

Once the investigations and cost estimates regarding illegal dumping, cleanup and recycling stations are completed, a presentation by CCCW and partners can be made to representatives throughout the SLV. We will also schedule meetings and coordinate with landfill managers, municipal leaders, CDPHE, BLM and USDA Forest Service personnel, Waste Management (WM) and Wall, Smith, Batemen (WSB) Recycles to present these findings, so that everyone is getting the same information that has an interest in illegal dumping and implementing solutions through recycling. This also includes industry specializing in solid waste and recycling businesses. This information will not only be used during outreach efforts for elected officials, public agencies, county staff, and solid waste service providers, but also be carried to the general public.

The contents of these findings will also include the benefits of prevention, recycling, and enforcement awareness to deter illegal dumping through recycling. Also, CCCW and partners will develop outreach material that emphasizes the economic benefit gained for all sectors by addressing illegal dumping through recycling.

Objective 3: Identifying resource gaps/capacity building/estimate costs of cleanup. The community leaders and public officials in the towns of Antonito, La Jara, Manassa, Romeo, Blanca, and San Luis will play a critical role using their county public health departments and town staff to develop community support and information about the hazards and costs of illegal dumping. They will be encouraged to work closely with RCAC to develop cost estimates and planning with regional solid waste facility managers near the town of Monte Vista to coordinate disposal efforts that support removal of solid waste that will be accumulated at transfer stations and recycling stations near their towns.

Planning and cost estimates need to include the cost of trucking these solid waste contents at transfer stations to neighboring Rio Grande County regional solid waste management facilities. Efforts will be made to identify what the current solid waste/recycling operations are doing in Alamosa, Rio Grande, and possibly Saguache Counties. From this study of current capacity, estimates will be calculated to determine what will be the costs for building needed infrastructure that may include recycling efforts in the future.

First and foremost, capacity building will result throughout all six communities and four counties within the SLV, including infrastructure building and coordination of efforts within the current SLV solid waste scheme. This EJPCS grant will give the SLV region resources to explore solutions to our illegal dumping problem through recycling and enhance capacity to implement effective solid waste management practices in the future. A presentation will be developed that compares the cost of proper disposal to the cost of cleanup.

Objective 4: Planning of Recycling Stations. CCCW and partners will estimate the costs of development and operation of current transfer stations and recycling for current transfer stations per county, three altogether for Conejos and Costilla Counties. Construction and operation of recycling stations will be calculated.

Cost of recycling sites include:



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- a. Comparing options for mixed streams and single streams; curbside, one large station, smaller community stations
- b. Design of a basic recycling pilot project
- c. Operation of pilot project and collection of data during operation
- d. Evaluation of pilot project data
- e. Design of scaling up successful pilot project components
- f. Cost of equipment
- g. Cost of infrastructure
- h. Cost of operation
  - i. Estimate of revenue from materials sales
  - ii. Contracted operation and/or transport
  - iii. Purchase and operation of equipment
- i. Identification of supplemental revenue stream for operations (if needed)

Objective 5: The benefits of the program development and hiring a project coordinator. A part-time project coordinator will be hired to facilitate communication, planning and outreach efforts. The coordinator will work closely with CCCW and partners but also communicate with various public officials, landfill managers, public agencies, businesses and most importantly the public. It will be the coordinator's responsibility to establish a network of communication with all the interested parties and structure regular meetings and outreach efforts. The coordinator will build capacity and encourage the sharing of resources to show the financial benefit.

The six communities will be informed that illegal dumping contaminates ground and surface water and is a threat to public health. For public officials and government agencies, they will gain knowledge of the costs and benefits of illegal dump clean up and of prevention measures through recycling.

The RCAC program development approach promotes community capacity development. CCCW and SLVEC both have a history of working with these local communities, so we understand the need and local skills, can develop community capacity in an efficient manner, and will seek potential solutions that guide us to select and implement the best plan. Through this program development, capacity will be developed, communities will benefit by developing the skills to solve these issues on their own, having institutionalized the necessary framework that is being implemented through this EJCPS grant.

Objective 6: Collaborate to develop additional funding for capacity building and to perform a cleanup and implementing recycling at one illegal dumpsite, and document it as a case study. Every effort will be made to work closely with counties, federal and state agencies, and small and large businesses to combine financial resources and efforts for capacity building, which will lead to a strategic plan that provides short and long-term goals. As part of this partner/resource collaboration, a site will be selected as a case study for cleanup, most likely in an area like the Culebra ditch in Costilla County, which now demonstrates a water source being surrounded by illegal dumping on top of its ditch banks. We would like to document a before/after scenario so the public has a graphic example of the environmental health benefits of restoring the landscape. Community groups, organized by CCCW and SLVEC would be involved with this cleanup effort so citizens would see first hand how removing the debris can transform the surrounding landscape. CCCW will organize eighth grade science student volunteers from Antonito Middle School to go out to sites to analyze and plan for cleanup.

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Please view the project milestone chart below in Figure 1 on page 10. The roles and responsibilities of all key organizations involved in the project are included, and milestones are marked with an x.

**Figure 1**

Task/ Activity	Q4 2014 Oct-Nov-Dec	Q1 2015 Jan-Feb-Mar	Q2 2015 Apr-May-Jun	Q3 2015 Jul-Aug-Sep	Q4 2016 Oct-Nov-Dec	Q1 2016 Jan-Feb-Mar	Q2 2016 Apr-May-Jun	Q3 2016 Jul-Aug-Sep	Role & Responsibility CCCW/RCAC/SLVEC
Project Award	x								CCCW
Objective 1									CCCW/RCAC/SLVEC
Objective 2									CCCW/RCAC/SLVEC
Objective 3									RCAC
Objective 4									RCAC
Objective 5									CCCW/SLVEC
Objective 6									CCCW/RCAC/SLVEC
Project Closeout								x	CCCW

**i) A concise description of the activities the project will undertake during the two-year project period to examine and address the environmental and/or public health issue(s).**

CCCW and partners propose to provide program development to six communities within the SLV region to minimize the health risks associated with illegal dumping. The project will achieve these results in the following manner:

1. Quantify the problem through baseline data and investigating and mapping the number, location, and contents of illegal dumpsites in the SLV.
2. Develop an Outreach Program Action Plan that includes the development of outreach awareness material that will encourage behavior change and commitment.
3. Estimate the cost to cleanup the illegal dumpsites and analyze costs of long-term solutions including recycling, which will include community savings and economic benefits.
4. Analyze the operation and maintenance of the few existing transfer stations and estimate the costs of adding recycling per county, three altogether for Conejos and Costilla Counties, which will better serve the six towns, since they will be much closer in proximity than the regional landfill.
5. Hire a coordinator to work with existing town and county personnel, water user organizations, and other non-profits to perform public outreach about the hazards of illegal dumping to the communities involved.
6. Collaborate to ensure additional funding and to perform a clean up at one illegal dumpsite including recycling and document it as a tangible success story for the public.

CCCW and partners will work with the six communities in Conejos and Costilla Counties, since they do not have a solid waste facility and have only three transfer stations in total for both their respective counties. CCCW and partners will create and implement an Outreach Program Action Plan that identifies specific community audiences. CCCW and partners will be working with current elected officials, county employees and Waste Management (WM) personnel to provide technical resources regarding the impacts of the illegal

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dumping, and assess the costs and benefits of strategies to deter it through recycling. The tasks and activities to be provided during the project will identify activities designed to engage, educate, empower, and enable the communities to understand the environmental and public health issues associated with illegal dumping.

RCAC will share comprehensive resources and develop planning efforts. Illegal dumpsites will be documented, inventoried and mapped. During the inventory process sites will be assessed for safe access and possible content hazards that would require special consideration during cleanup. During inventory site quantities will be measured and categorized for topography. CCCW will work with eighth grade science students from Antonito Middle School to map some of the illegal dumpsites using GIS/GPS software. An estimated cleanup cost for each site will be calculated. Cleanup costs will include onsite collection (equipment, labor, containers, etc.), transport to the landfill, and tipping fees. The total costs for each site will be compared to what it would have cost for proper disposal. This information will then be used during the public outreach.

Construction and operation of added recycling stations will be calculated. The cost of proper disposal will be compared to the cost of cleanup. This information will then be used during outreach to elected officials, county staff, and solid waste service providers.

CCCW and partners, working with a hired coordinator, will develop an Outreach Program Action Plan based upon citizen participation by objectives. This program will be developed to ensure maximum participation of public officials and citizens depending on their interest and motivation to engage. The Institute for Participatory Management and Planning [www.ipmp.com](http://www.ipmp.com) also provides an online curriculum that the coordinator will engage. We anticipate three different constituencies: 1) Code enforcement, elected officials, county personnel/law enforcement, BLM and USDA Forest Service personnel; 2) local water protection/non-profit potential partners, local churches, schools and residents, including illegal dumpers; 3) industry/business partners.

Various messages will be developed, depending on the motivation for engagement: health and environmental protection, cultural legacy, economic impact and fairness. This information will be disseminated amongst the various constituencies and a check in through citizen feedback (meetings, quick evaluations) will be implemented to course correct and make sure that the message(s) are being heard. There will also be a follow up towards the end of the implementation of Phase I to monitor behavior change and evaluate those findings.

Once funds are secured, communities will have the experience of performing a cleanup including recycling at one dumpsite, demonstrating what is feasible and within reasonable action to accomplish. The demonstration “case study” cleanup will provide a model for future community cleanup projects. It will also strengthen communication and coordination of efforts, proving the SLV, working together, can accomplish long-term solutions. CCCW, with its established volunteer network, including eighth grade science students from Antonito Middle School, along with the coordinator, will galvanize citizens to accomplish these cleanup efforts.

Our project will assist USEPA to meet its objectives to protect drinking source waters, reduce water resource pollution and improve planning and management of solid waste sites in rural areas through assistance to help communities combat illegal dumping. The collaborative problem solving model elements are incorporated into the project, as well as the collaborative partnership efforts to increase the communities’ capacity to address local environmental and/or public health issues associated with illegal dumping. Please see Table 2 on page 12.

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**Table 2**

Tasks	Intermediate Benefits	Long-Term Benefits
Assist towns and counties to investigate: <ul style="list-style-type: none"> <li>•Number of dumps</li> <li>•Location of dumps</li> <li>•Contents of dumps</li> <li>•Percent recycling</li> <li>•Who is dumping, distance travelled</li> </ul>	<ul style="list-style-type: none"> <li>•Quantify the scope of the problem</li> <li>•Provide data to identify solutions through recycling</li> </ul>	Baseline information against which to measure improvement
Estimate the cost to cleanup dumpsites	Evaluate costs/benefits	Budget for cleanup activity
Estimate the cost to implement recycling to prevent dumping	<ul style="list-style-type: none"> <li>•Evaluate the cost savings that preventing illegal dumping through recycling can provide</li> <li>•Inform town and county government to promote no-dumping</li> </ul>	Budget justification for implementing anti-dumping strategies
Estimate cost of recycling stations	<ul style="list-style-type: none"> <li>•Cost comparison, single stream, mixed stream, curbside vs. recycling at station</li> <li>•Design of recycling station</li> <li>•Develop relationship with solid waste facilities</li> <li>•Identify additional partners to problem solve</li> </ul>	<ul style="list-style-type: none"> <li>•Develop plan for recycling station</li> <li>•Inform constituency to dispose of waste stream properly</li> <li>•Encourage recycling</li> <li>•Purchase more equipment</li> </ul>
Identify, hire and train one person to perform public outreach, 25 hrs./week for 22 months about the hazards of illegal dumping and the benefits of recycling to the communities involved	<ul style="list-style-type: none"> <li>•Inform the towns, county officials, public and schools about the impacts of illegal dumping through various media and outreach material</li> <li>•Develop capacity and information sharing network to improve efficiencies</li> </ul>	<ul style="list-style-type: none"> <li>•Ongoing awareness targeted to changing dumping behavior</li> <li>•Develop town and capacity</li> </ul>
Develop an Outreach Program Action Plan	Present findings to public officials, staff, public agencies, businesses, non-profits, water user communities, land fill managers, and the public; target messages to appropriate audience; and monitor effectiveness	Shape public involvement and impact behavior change
Design and install "recycling" signage	Discourage illegal dumpers and encourage legal recycling	Discourage illegal dumpers and encourage legal recycling
Facilitate a community cleanup and recycling project	<ul style="list-style-type: none"> <li>•All parties learn to work together</li> <li>•One site gets cleaned up and recycling</li> <li>•Get students involved with cleanup</li> </ul>	<ul style="list-style-type: none"> <li>•One site is cleaned up and has recycling</li> <li>•Community maintains motivation to prevent further dumping and encourage recycling</li> </ul>
<ul style="list-style-type: none"> <li>•Ongoing awareness targeted to changing dumping behavior</li> <li>•Develop town and county capacity</li> </ul>	<ul style="list-style-type: none"> <li>•Communities develop relationships with other sources of funding and begin to develop their own capacity</li> <li>•Empower communities to continue working on cleanup and recycling projects</li> </ul>	<ul style="list-style-type: none"> <li>•Ongoing cleanup and recycling projects</li> <li>•Clean water, healthier environment, reduced human health risks</li> <li>•Once public is informed, develop long-term strategy for passage of mill levy in Conejos and Costilla Counties</li> </ul>

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**ii) A concise description of how the organization and its partners will work together during the years to address the local issue(s).**

CCCW and partners will use a proven methodology for assessing the problem, and costs and benefits of solutions to illegal dumping through recycling. Long-term/short-term economic scenarios will be analyzed and recorded. Our project will assist USEPA meet its objectives to protect drinking water sources, reduce both ground and surface water pollution, and improve planning and management of solid waste sites in rural areas through assistance that ultimately will help the towns clean up their land and protect citizen health. CCCW and partners view this project as a first step toward building the communities' capacity to prevent illegal dumping through recycling. It will also be an opportunity to instill a sense of pride in the landscape and opportunity to enhance a positive cultural legacy and embraced sense of place.

Andrea Guajardo, CCCW Director, a mechanical engineer with project engineering expertise, a SLV native, will be the project manager on this project. Christine Canaly, Director of SLVEC and implementer of numerous baseline data collection environmental programs, will assist with community outreach and long-term strategic planning. Rural Development Specialist and licensed Civil Engineer Jay Mashburn, RCAC, will assist with meeting project objectives, and counsel with information as requested from CCCW.

**V. Organizational Capacity and Programmatic Capability**

In June of 2010, CCCW incorporated into a Colorado non-profit organization. Subsequently, CCCW petitioned for and received 501(c)(3) federal tax-exempt status. CCCW is comprised of ranchers, teachers, small business owners, and concerned citizens. The organization has an 11 board member steering committee including an executive director and 402 general members. The project manager described in Section VI will be hired and will report to the 11 board member steering committee for Recycle Conejos and Costilla Counties progress as well as reporting progress on "outputs" and "outcomes" as described in Appendix E.

An elected treasurer uses QuickBooks software and presently produces a quarterly report given to the CCCW's 11 board member steering committee for review, and manages CCCW's accounting program. A Certified Public Accountant (CPA) will prepare the IRS 990 Report using the detailed accounting history that has been developed throughout the year. Standard operating procedure will include: monthly balanced bank statements, and checks written against pre-approved invoices with each check signed by two board members. There is significant separation of duties applied to this process involving at least five individuals.

CCCW has successfully complied with and completed in a timely manner all reports and deliverables associated with a previously received federal grant, project HELP, which was funded through USEPA's EJ Small Grant Program, Grant #EQ96817101, Project Officer April Nowak. The project outcomes were to create a baseline data set for ambient air, water, soil, and health in Conejos County with regard to radioactive, hazardous, and toxic contaminants and their respective degenerative diseases, also to establish an air monitor station for particulate matter that will have the ability to collect radioactive, hazardous and toxic contaminant samples for laboratory analysis.

Project partner SLVEC has been executing federal grants since 2007 including the Health Risk Assessment conducted through USEPA's CARE level 1, and has over 20 years experience supporting communities in the SLV.

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RCAC, another project partner, has over 30 years experience as a program development provider to rural communities through more than 150 grants, contracts and investments, including numerous non-federal supporters.

### **VI. Qualifications of the Project Manager (PM)**

The project manager (PM) CCCW has identified to execute the Recycle Conejos and Costilla Counties project is Andrea Guajardo, who is the founding board member of the organization. She was selected as the executive director in August of 2011. Organized in 2010, CCCW is based in one of the oldest Hispanic communities in the United States, Conejos County. Under Ms. Guajardo's leadership CCCW incorporated to promote awareness around health and environmental health issues in Conejos County as a mechanism to protect public health and responsibly manage natural resource.

Ms. Guajardo is an eighth-generation resident of Conejos County and holds a Bachelor of Science degree in mechanical engineering from Colorado School of Mines. During the fall of 2010, Ms. Guajardo served on the task force assembled by former Congressmen John Salazar to help resolve the radioactive, hazardous, and toxic waste dispute involving the DOE, the San Luis & Rio Grande Railroad, and EnergySolutions. Ms. Guajardo's consistent advocacy for fair public process during task force discussions ultimately resulted in a legal settlement to ensure that Conejos County would have a fair public NEPA process prior to radioactive, hazardous, and toxic waste transfer through Conejos County.

In the past, Ms. Guajardo promoted awareness on the following campaigns in Conejos County: Environmental Assessment for LATN, where the federal agency Cannon Air Force Base was seeking air space for simulated military conditions in mountainous regions; Supplement to the DPEIS for Solar Energy Development in Six Southwestern States, where the DOE and the BLM identified federal lands for solar energy development in an effort to streamline the development process; DEIS for Low-Level Radioactive Waste and GTCC Like Waste, where the federal agency the NRC is identified federal sites for the storage of commercial wastes; and DEIS for Nuclear Facility CMRR, where the federal agency DOE attempted to demolish an old facility for the purpose of building a new facility to build plutonium pits, nuclear weapons triggers. Prior to working for CCCW, Ms. Guajardo managed a plethora of projects to protect environment in the states of Colorado, Texas, and California. She successfully managed projects from conceptualization, through engineering, during execution, ending in start-up and transition to clients. Projects include: redesign of Probat Roasters burners at a Maxwell House coffee plant to reduce greenhouse gas emissions, redesign of cooling towers to increase efficiency and reduce electrical consumption at a Maxwell House coffee plant; design of caustic wash recycle system to reduce degenerative chemicals in a natural cheese plant's waste stream to the municipality; and a total plant waste balance to reduce electro-conductivity in a natural cheese plant's waste stream to the municipality.

Ms. Guajardo's project management experience coupled with her unique voice rooted for generations in an environmental justice community make her a prime choice for leading the execution of the proposed Recycle Conejos and Costilla Counties since she understands the importance of building relationships and advocating for EJ communities through those relationships. Ms. Guajardo understands that executing Recycle Conejos and Costilla Counties relies on collaborative efforts as a Please see Appendix G for PM and other personnel detailed resumes.

### **VII. Past Performance in Reporting on Outputs and Outcomes**

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The outputs will be quantitative and qualitative, and will be measurable during a specific funding period related to environmental and public health goals and objectives that will be compiled over a period of time, and reported on at a specified date. Subsequently, the result, effect, or consequence that will occur from carrying out the project environmental activity, effort, and the associated work product is the outcome. Please view the logic model created for this project in Appendix E.

CCCW has successfully complied with and completed in a timely manner all reports and deliverables associated with a previously received federal grant, project HELP, which was funded through USEPA's EJ Small Grant Program. The project outcomes were achieved satisfactorily as can be seen in the project closeout letter attached in Appendix I. The outcomes were to create a baseline data set for ambient air, water, soil, and health in Conejos County with regard to radioactive, hazardous, and toxic contaminants and their respective degenerative diseases, also to establish an air monitor station for particulate matter that will have the ability to collect radioactive, hazardous, and toxic contaminant samples for laboratory analysis. Project HELP had a Grant #EQ96817101 was for \$25,000, and Project Officer April Nowak.

### **VIII. Expenditure of Awarded Grant Funds**

CCCW can commit all necessary financial resources to achieve the goals and objectives set forth for this project. CCCW can utilize an established office in Alamosa whose resources will be committed for this project. We use a QuickBooks system that is overseen by retired bookkeeper and our elected Treasurer, Martha Abeyta.

Please view the detailed budget created for this project in Appendix D. Please see Figure 2 below, which has the timeline of project activities and the associated expenditure of awarded grant funds for Recycle Conejos and Costilla Counties.

**Figure 2**

Task/ Activity	Q4 2014 Oct-Nov-Dec	Q1 2015 Jan-Feb-Mar	Q2 2015 Apr-May-Jun	Q3 2015 Jul-Aug-Sep	Q4 2016 Oct-Nov-Dec	Q1 2016 Jan-Feb-Mar	Q2 2016 Apr-May-Jun	Q3 2016 Jul-Aug-Sep	Expenditure \$
Project Award	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Objective 1	\$ 10,000.00	\$ 10,000.00	\$ 11,000.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 31,000.00
Objective 2	\$ -	\$ 6,000.00	\$ 7,000.00	\$ 8,000.00	\$ -	\$ -	\$ -	\$ -	\$ 21,000.00
Objective 3	\$ -	\$ -	\$ 8,000.00	\$ 8,000.00	\$ 10,000.00	\$ -	\$ -	\$ -	\$ 26,000.00
Objective 4	\$ -	\$ -	\$ -	\$ 7,000.00	\$ 7,000.00	\$ 7,000.00	\$ -	\$ -	\$ 21,000.00
Objective 5	\$ 2,000.00	\$ 3,000.00	\$ 3,000.00	\$ 3,000.00	\$ 3,000.00	\$ 2,000.00	\$ 2,000.00	\$ 3,000.00	\$ 21,000.00
Objective 6	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Closeout	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Expenditure	\$ 12,000.00	\$ 19,000.00	\$ 29,000.00	\$ 26,000.00	\$ 20,000.00	\$ 9,000.00	\$ 2,000.00	\$ 3,000.00	\$120,000.00

### **IX. Quality Assurance Project Plan (QAPP) Information**

CCCW believes this project will not involve the use of existing environmental data and the collection of new data (the checklist in Appendix F was utilized to make this determination).